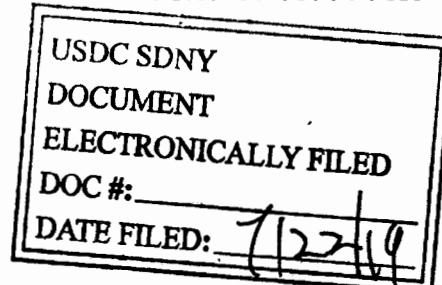


IN RE GSE BONDS ANTITRUST LITIGATION

Docket No. 1:19-cv-01704-JSR



**STIPULATION AND [PROPOSED] ORDER REGARDING STAY OF PROCEEDINGS
AS TO DEFENDANT DEUTSCHE BANK**

WHEREAS, on February 22, 2019, Plaintiffs City of Birmingham Retirement and Relief System, Electrical Workers Pension Fund Local 103, I.B.E.W., and Local 103, I.B.E.W. Health Benefit Plan filed a complaint in Case No. 1:19-cv-01704 in this Court (the "Birmingham Complaint"), naming as Defendants, among others, Deutsche Bank AG and Deutsche Bank Securities Inc. (collectively, "Deutsche Bank");

WHEREAS, a number of other related complaints¹ were then filed in this Court by other Plaintiffs in this Court also naming as Defendants Deutsche Bank AG and/or Deutsche Bank Securities Inc.;

¹ *Alaska Elec. Pension Fund v. Bank of America, N.A., et al.*, No. 1:19-cv-01796; *Deerfield Beach Mun. Firefighters' Pension Trust Fund v. Bank of America, N.A., et al.*, No. 1:19-cv-01900; *Lincolnshire Police Pension Fund v. Bank of America, N.A., et al.*, No. 1:19-cv-02045; *Torsella v. Bank of America, N.A., et al.*, No. 1:19-cv-02438; *Int'l Ass'n of Heat & Frost Insulators & Allied Workers Local No. 14 Pension & Health & Welfare Funds v. Bank of America, N.A., et al.*, No. 1:19-cv-02661; *Dallas Area Rapid Transit Emps. Defined Benefit Ret. Plan & Trust, et al., v. Bank of America, N.A., et al.*, No. 1:19-cv-02715; *UFCW Local 1776 & Participating Emp's Pension Fund v. Bank of America, N.A., et al.*, No. 1:19-cv-02755; *City of Baltimore v. Bank of America, N.A., et al.*, No. 1:19-cv-02900; *Oklahoma Police Pension and Ret. Sys. v. Bank of America, N.A., et al.*, No. 1:19-cv-03091; *Police Ret. Sys. of St. Louis v. BOFA Sec., Inc., et al.*, No. 1:19-cv-03122; *Puerto Rico Gov't Emps. & Judiciary Ret. Sys. Admin. v. BOFA Sec., Inc., et al.*, No. 1:19-cv-03261 (collectively with the Birmingham Complaint, the "Related Actions").

WHEREAS, by way of orders on April 3, 2019, April 12, 2019, and May 1, 2019, the Court consolidated the Related Actions under the title *In re GSE Bonds Antitrust Litigation*;

WHEREAS, on May 14, 2019, the Court issued a Civil Case Management Plan setting dates and deadlines for, *inter alia*, discovery;

WHEREAS, on May 23, 2019, Plaintiffs Joseph M. Torsella, in his official capacity as the Treasurer of the Commonwealth of Pennsylvania and statutory custodian of all Commonwealth Funds; City of Birmingham Retirement and Relief System; Electrical Workers Pension Fund Local 103, I.B.E.W.; and Local 103, I.B.E.W. Health Benefit Plan (hereinafter "Plaintiffs") filed a Consolidated Amended Class Action Complaint which did not name Deutsche Bank as a Defendant;

WHEREAS, on July 12, 2019, Plaintiffs filed a Second Consolidated Amended Class Action Complaint naming Deutsche Bank Securities Inc. as a Defendant;

WHEREAS, Deutsche Bank Securities Inc. and Plaintiffs have agreed that Deutsche Bank Securities Inc. does not need to respond to any of the "Discovery" deadlines imposed by the Court's May 14 Civil Case Management Plan or deadlines imposed by the Federal or Local Rules of Civil Procedure;

WHEREAS, Plaintiffs and Deutsche Bank expect to finalize within the next thirty (30) days an agreement to settle, subject to the Court's approval, all of Plaintiffs' claims against Deutsche Bank;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, that:

1. Dates and deadlines in Section E "Discovery" of the Civil Case Management Plan are hereby suspended and adjourned for 30 days as to Deutsche Bank Securities Inc. and as to

Plaintiffs where relevant to their claims against Deutsche Bank Securities Inc. No other dates in the Case Management Plan will be altered to accommodate Deutsche Bank Securities Inc.

Dated: July 17, 2019
New York, New York

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SO ORDERED.

Dated: New York, New York
July 11, 2019


Hon. Jed S. Rakoff